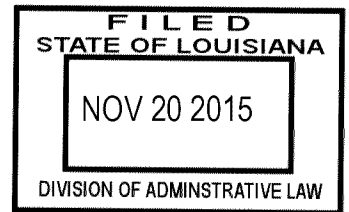


**STATE OF LOUISIANA**  
**DIVISION OF ADMINISTRATIVE LAW**



<b>LOUISIANA BOARD OF ETHICS</b>	*	<b>DOCKET NO.</b>
	*	
<b>IN THE MATTER OF</b>	*	
	*	
<b><u>WALTER MONSOUR</u></b>	*	<b>AGENCY TRACKING NO. 2014-1353</b>

**CHARGES**

The Louisiana Board of Ethics, with Julie Blewer recused, voted on November 19, 2015, to and does hereby file the following charge:

**1.**

The East Baton Rouge Redevelopment Authority ("RDA") was created pursuant to La. R.S. 33:4720.151 for the purpose of eliminating and preventing the development or spread of slums and blight, to encourage needed rehabilitation, and to provide for the redevelopment of slum and blighted areas.

**2.**

Walter Monsour was employed as the President and Chief Executive Officer of the RDA from January 2009 until November 30, 2014.

**3.**

Walter Monsour also served as the Executive Director of the East Baton Rouge Community Development Entity, LLC, ("CDE") a non-profit limited liability company of which 51% is owned by the City of Baton Rouge-Parish of East Baton Rouge and 49% is owned by the RDA and formed for the purpose of facilitating the issuance of New Markets Tax Credits ("NMTC") to achieve the RDA's statutory purpose.

4.

Walter Monsour is the father of Jordan Monsour.

5.

Jordan Monsour joined the Butler Snow law firm on January 12, 2011 as a non-equity partner. He became an equity partner in the Butler Snow law firm on January 1, 2012.

6.

Jordan Monsour, on behalf of the Butler Snow law firm, represented the Windsor/Aughtry Company, Red Stick Hospitality, LLC, and their respective affiliated entities in connection with their proposed NMTC financing for the development of a Hampton Inn to be located in downtown Baton Rouge, Louisiana ("Hampton Inn project").

7.

The Windsor/Aughtry Company was billed a total of \$48,512 by the Butler Snow law firm from January 31, 2011 through February 10, 2012. Between January 31, 2011 and August 31, 2011, Jordan Monsour billed 37.2 hours at \$260 per hour for a total of \$8,754.33. Jordan Monsour made further billings during the time period of September 1, 2011 through November 29, 2011, in addition to four other employees of the Butler Snow law firm, for which the Windsor/Aughtry Company was billed a total of \$2,484.85.

8.

As part of his representation of the Windsor/Aughtry Company, Red Stick Hospitality, LLC, and their respective affiliated entities, Jordan Monsour represented the entities in transactions with the CDE and the RDA in order to pursue financing. Thereafter, the CDE and the RDA approved NMTC financing in the amount of \$17 million for the Hampton Inn project.

**9.**

Jordan Monsour, on behalf of the Butler Snow law firm, represented Honeywell International, Inc., and its affiliated entities in connection with Honeywell's proposed NMTC financing for the retooling, upgrades and improvements to be constructed at its existing refrigerant manufacturing facility located in Baton Rouge, Louisiana ("Honeywell project").

**10.**

Honeywell International, Inc., was billed a total of \$100,349.54 by the Butler Snow law firm from February 1, 2012 through February 10, 2014. During that same time period, Jordan Monsour billed 135 hours for a total of \$31,704.15.

**11.**

As part of his representation of Honeywell International, Inc., and its affiliated entities, Jordan Monsour represented the entities in transactions with the CDE and the RDA in order to pursue financing. Thereafter, the CDE and the RDA approved NMTC financing in the amount of \$17.5 million for the Honeywell project.

**12.**

Jordan Monsour, on behalf of the Butler Snow law firm, represented Model Block, LLC, in connection with the structuring and financing of Model Block's proposed redevelopment of certain properties located in Baton Rouge, Louisiana ("Model Block project").

**13.**

Model Block, LLC, was billed a total of \$73,868.58 by the Butler Snow law firm from October 20, 2011 through April 1, 2014. During that same time period, Jordan Monsour billed 173.5 hours for a total of \$57,521.

**14.**

As part of his representation of Model Block, LLC, Jordan Monsour represented the entity in transactions with the RDA in order to pursue financing. Thereafter, the RDA approved \$700,000 under the Gap Finance for Commercial Development Program for the Model Block project.

**15.**

Jordan Monsour, on behalf of the Butler Snow law firm, represented Circa 1857, LLC, in connection with the structuring and financing, including possible tax credit investment, HUD loan and other incentives, for the development of a mixed-use project located in Baton Rouge, Louisiana (“Circa 1857 project”).

**16.**

Circa 1857, LLC, was billed a total of \$60,832 by the Butler Snow law firm from October 3, 2012 through July 29, 2013. During that same time period, Jordan Monsour billed 190.3 hours for a total of \$52,704.50.

**17.**

As part of his representation of Circa 1857, LLC, Jordan Monsour represented the entity in transactions with the RDA and the CDE in order to pursue NMTC financing in the amount of \$8.1 million. However, the Circa 1857 project did not ultimately receive the financing.

**18.**

Jordan Monsour received the following compensation from the Butler Snow law firm:

2011 - \$229,028  
2012 - \$279,240  
2013 - \$335,174  
2014 - \$402,536

**19.**

Walter Monsour did not submit a disqualification plan to the Louisiana Board of Ethics. Therefore, as the President and CEO of the RDA and Executive Director of the CDE, Walter Monsour was the agency head and deemed to have participated in all transactions involving his agency.

**20.**

La. R.S. 42:1112B provides that no public servant shall participate in a transaction involving the governmental entity in which, to his actual knowledge, any member of his immediate family has a substantial economic interest.

**21.**

La. R.S. 42:1102(3) provides that “agency head” means the chief executive or administrative officer of an agency or any member of a board or commission who exercises supervision over the agency.

**22.**

La. R.S. 42:1102(15) provides that “participate” means to take part in or to have or share responsibility for action of a governmental entity or a proceeding, personally, as a public servant of the governmental entity, through approval, disapproval, decision, recommendation, the rendering of advice, investigation, or the failure to act or perform a duty.

**23.**

La. R.S. 42:1112C provides that every public employee, excluding an appointed member of any board or commission, shall disqualify himself from participating in a transaction involving the

governmental entity when a violation of this Part would result. The procedures for such disqualification is set forth in Chapter 14 of the Administrative Rules for the Board of Ethics.

**24.**

Based on the foregoing facts, Walter Monsour violated La. R. S. 42:1112B by virtue of his participation in transactions, in his capacity as the President and CEO of the RDA and the Executive Director of the CDE, involving the RDA and the CDE in which his son, Jordan Monsour, had a substantial economic interest. Walter Monsour, as the agency head of the RDA and the CDE, participated in which his son, Jordan Monsour, was representing the following clients: 1.) Windsor/Aughtry Company, Red Stick Hospitality, LLC, and their respective affiliated entities; 2.) Honeywell International, Inc., and its affiliated entities; 3.) Model Block, LLC; and 4.) Circa 1857, LLC, in their pursuit of NTMC financing or financing under the Gap Financing for Commercial Development Program from the RDA and/or the CDE.

**25.**

In accordance with La. R.S. 42:1141C(3)(b)(iv), the Board designates Vivian Haley Williams and Michael Dupree as the Board's trial attorneys in this matter.

**WHEREFORE**, the Louisiana Board of Ethics requests that the Ethics Adjudicatory Board (a) conduct a hearing on the foregoing charge; (b) determine that Walter Monsour, violated La. R.S. 42:1112B; and (c) assess appropriate penalties in accordance with the recommendation of the Louisiana Board of Ethics to be submitted at the hearing.


[SIGNATURE AND SERVICE INFORMATION ON THE FOLLOWING PAGE]



Blake Monroe  
Chairman, Louisiana Board of Ethics  
P.O. Box 4368  
Baton Rouge, LA 70821  
Telephone: (225) 219-5600  
Facsimile: (225) 381-7271

**CERTIFICATE:**

I hereby certify that a copy of this document has been forwarded to the Respondent by registered/certified mail in accordance with La. R.S. 42:1141E(1)(a), on this 20<sup>th</sup> day of November, 2015.

  
Vivian Haley Williams  
Trial Attorney

**SERVICE INFORMATION:**

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